

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

LODSYS, LLC,

Plaintiff,

VS.

BROTHER INTERNATIONAL CORPORATION;  
CANON U.S.A., INC.;  
HEWLETT-PACKARD COMPANY;  
HULU, LLC;  
LENOVO (UNITED STATES) INC.;  
LEXMARK INTERNATIONAL, INC.;  
MOTOROLA MOBILITY, INC.;  
NOVELL, INC.;  
SAMSUNG ELECTRONICS CO., LTD.;  
SAMSUNG ELECTRONICS AMERICA, INC.;  
SAMSUNG TELECOMMUNICATIONS AMERICA, LLC;  
TREND MICRO INCORPORATED.

Defendants.

Civil Action No. 2:11-CV-90-TJW

## JURY TRIAL DEMANDED

**DEFENDANT SAMSUNG ELECTRONICS AMERICA, INC.'S UNOPPOSED MOTION  
FOR EXTENSION OF TIME IN WHICH TO ANSWER, MOVE, OR OTHERWISE  
RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Samsung Electronics America, Inc., without waiving any defenses or any matters that might be presented pursuant to Federal Rule of Civil Procedure 12(b) or any other rule or law, files this unopposed motion for an extension of time in which to answer, move, or otherwise respond to Plaintiff Lodsys, LLC's Complaint and would respectfully show the Court as follows:

Defendant Samsung Electronics America, Inc. has requested, and Plaintiff Lodsys, LLC has agreed to an extension of time for Samsung Electronics America, Inc. to respond in any

manner whatsoever, including answer, motion, or other pleading of any type to Plaintiff's Complaint. Specifically, Defendant Samsung Electronics America, Inc. requests, and Plaintiff Lodsys, LLC does not oppose an extension of time up to and including May 24, 2011.

Wherefore, Defendant Samsung Electronics America, Inc. respectfully prays that the time to answer, move, or otherwise respond to Plaintiff's Complaint be extended up to and including May 24, 2011.

DATED: March 4, 2011

Respectfully submitted,

GILLAM & SMITH, L.L.P.

/s/Melissa Richards Smith

Melissa Richards Smith

Texas State Bar No. 24001351

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**ATTORNEY FOR DEFENDANT  
SAMSUNG ELECTRONICS  
AMERICA, INC.**

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by U.S. mail or facsimile transmission, on this the 4th day of March, 2011.

/s/Melissa Richards Smith

Melissa Richards Smith